

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
)	Civil No. 04-12072-PBS
v.)	
)	
BUENAVENTURA LOVOS,)	
)	
Defendant.)	

GOVERNMENT'S MOTION SEEKING LEAVE UNTIL JANUARY 18, 2005
TO FILE ITS OPPOSITION TO LOVOS' §2255 PETITION

Now comes the United States of America, (the "government"), and hereby respectfully moves this Honorable Court to allow the government until January 18, 2005 to complete its opposition to defendant Lovos' §2255 Petition. The government is aware that Lovos filed his petition back on September 7, 2004 and that the Court directed the government, by Order of October 1, 2004, to provide a response within twenty (20) days of said Order.

Government counsel encountered work related difficulties in October and November that prevented it from preparing an appropriate response to Lovos' petition. In addition, at this writing, the undersigned is leaving the U.S. Attorney's office for private practice and has arranged for the Lovos matter to be handled by another AUSA.

For these reasons, the government respectfully requests that

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the Court permit the government, essentially, 30 additional days to prepare a response to Lovos' petition.

The government apologizes to the Court for its delay in filing its response, but reports that it a response can and will be filed by the requested date. As such, the government respectfully requests the requested 30 days extension to draft and file its Opposition to petitioner's §2255 motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: s/Robert L. Peabody
ROBERT L. PEABODY
Assistant U.S. Attorney
(617) 748-3240

Dated: December 13, 2004

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

**BUENAVENTIURA LOVOS
No. 24035-038
Federal Correctional Institution
P.O. Box 6001
Ashland, KY 41105**

This 13th day of December, 2004

s/Robert L. Peabody
ROBERT L. PEABODY
ASSISTANT UNITED STATES ATTORNEY